

Honorable David G. Estudillo

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

CINDY VAN LOO, an Oregon resident, as Personal
Representative of the ESTATE OF MICHAEL F.
REINOEHL,

Plaintiff,

vs.

THE UNITED STATES OF AMERICA; PIERCE
COUNTY, a political subdivision of the State of
Washington; the MUNICIPALITY OF
LAKEWOOD, a municipal corporation; STATE OF
WASHINGTON; JAMES OLEOLE, an individual;
CRAIG GOCHA, an individual; MICHAEL
MERRILL, an individual; and JACOB
WHITEHURST, an individual.

Defendants.

NO. 3:23-cv-05618-DGE

**[PROPOSED] ORDER
GRANTING DEFENDANTS'
CITY OF LAKEWOOD AND
MICHAEL MERRILL'S MOTION
FOR SUMMARY JUDGMENT
AND MEMORANDUM IN
SUPPORT**

THIS MATTER came on for consideration on the Defendants' City of Lakewood and Michael Merrill's Motion for Summary Judgment and Memorandum in Support. The court has reviewed the following:

1. Motion for Summary Judgment and Memorandum in Support on Behalf of the City of Lakewood and Michael Merrill;
2. Declaration of Michael Merrill;
3. Defendants' Joint Statement of Undisputed Facts.

**[PROPOSED] ORDER GRANTING DEFENDANTS' CITY OF
LAKEWOOD AND MICHAEL MERRILL'S MOTION FOR
SUMMARY JUDGMENT AND MEMORANDUM IN
SUPPORT- 1**

*LAW, LYMAN, DANIEL,
KAMERRER & BOGDANOVICH, P.S.
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1 and, the following opposing materials:

2 4. _____; and

3 5. _____.

4 and, the following reply materials, if any:

5 6. _____; and

6 7. _____.

7
8 These records and files show that there is no genuine issue as to any material fact regarding
9 plaintiff's claims against the defendants, and that defendants are entitled to summary judgment of
10 dismissal of these claims as a matter of law. Now, therefore, IT IS HEREBY ORDERED that
11 Defendants' Motion for Summary Judgment and Memorandum in Support is hereby GRANTED, and all
12 claims are hereby DISMISSED with prejudice.

13 DONE this ____ day of _____, 2024 in Court.

14
15
16 _____
The Honorable David G. Estudillo

17 Presented by:

18 LAW, LYMAN, DANIEL, KAMERRER
19 & BOGDANOVICH, P.S.

20 /s/ John E. Justice

21 _____
John E. Justice, WSBA No. 23042
22 Attorney for Defendants City of Lakewood
and Michael Merrill
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25
26 **[PROPOSED] ORDER GRANTING DEFENDANTS' CITY OF
LAKEWOOD AND MICHAEL MERRILL'S MOTION FOR
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